

TECHNICAL REVIEW DOCUMENT
for
OPERATING PERMIT 95OPMN085
to be issued to:

Northwest Pipeline Corporation
Pleasant View Station
Montezuma County
Source ID 0830034

Geoffrey D. Drissel Review Engineer
Revised for Renewal April 24, 2007

I. Purpose:

This document will establish the basis for decisions made regarding the applicable requirements, emission factors, monitoring plan and compliance status of emission units covered by the renewal operating permit proposed for this site. The original Operating Permit was issued July 1, 1997. This document is designed for reference during the review of the proposed permit by the EPA, the public, and other interested parties. The conclusions made in this report are based on information provided in the renewal application submitted April 3, 2007, previous inspection reports and various e-mail correspondence, as well as telephone conversations with the applicant. Please note that copies of the Technical Review Document for the original permit and any Technical Review Documents associated with subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at <http://www.cdphe.state.co.us/ap/Titlev.html>.

Any revisions made to the underlying construction permits associated with this facility made in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised Construction Permit.

II. Source Description:

This source is classified as a natural gas compression facility defined under Standard Industrial Classification 4922. Gas is compressed to specification for transmission to sales pipelines using Combustion Turbines to power compressor units.

The facility is located in Montezuma County near the Town of Pleasant View in an area designated as attainment for all criteria pollutants. This source is a true minor with respect to Prevention of Significant Deterioration (PSD) requirements. The facility is located within 50 miles of the Utah, Arizona, and New Mexico borders. Additionally, two Federal Class I areas, the Weminuche National Wilderness Area and Mesa Verde National Park, are located within 100 kilometers of the facility. The facility has certified that they are not subject to the Accidental Release provisions of section 112(r) of the Clean Air Act. Facility wide emissions are as follows:

<u>Pollutant</u>	<u>Potential to Emit (tpy)</u>	<u>Actual (tpy)</u>
NOx	125.4	96.1
VOC	6.2	0.6
CO	25.6	25.6

Potential emissions are based on permit limits contained in the current Operating Permit. Actual emissions are based upon updated APENs received on 4/6/07 giving 2006 values. This facility is required to provide an updated APEN in the event that emissions of any of the above air pollutants increase 5% or 50 tons per year, whichever is less, above the level reported on the last APEN submitted to the APCD. The Division assumes that emissions from this facility have remained the same or decreased since the last APEN submittal based upon the compliance certification in the renewal operating permit application. This facility is not a major source of HAPs and, consequently, it is not subject to either Subpart HH or Subpart HHH of the National Emission Standards for Hazardous Air Pollutants.

Note that none of the emission units are equipped with control devices and therefore the Compliance Assurance Monitoring (CAM) requirements do not apply to any of the emission units at this facility.

III. Discussion of Modifications Made

Source Requested Modifications

The source did not request any changes to the permit in their renewal application other than a change in the responsible official.

Other Modifications

Although the source did not request any changes to their permit in their renewal application, the Division has included changes to make the permit more consistent with recently issued permits, including comments made by EPA on other Operating Permits, as well as to correct errors or omissions identified during review of this renewal. These changes are as follows:

Section I - General Activities and Summary

- The language in Condition 1.4 was changed to include General Conditions 3d and 3g (last paragraph) to the list of State-only enforceable conditions.
- The language in Condition 3.1 was revised based on comments made by EPA and to reflect changes to the Colorado Regulation citations.

Section II - Specific Permit Terms

Section II.1.1: Emission calculation language

- The language regarding the calculation of emissions using the established emission factors was updated to reflect the current version.

Section II.1.4: Opacity compliance language

- The language regarding the presumption of compliance with the opacity standard if natural gas is used as fuel was updated to reflect the current version.

Section II.1.6: SO₂ emission limits

The language regarding the requirements for demonstrating compliance with the NSPS GG SO₂ emission limitations was updated to reflect the current Division version.

Section II.1.7: Portable monitoring language

- The language regarding the requirements for quarterly portable monitoring of the turbines was updated to reflect the current version.

Section III – Permit Shield

- The citation at the beginning of Section III was updated.

Section IV - General Conditions

- The General Conditions were updated to reflect the most current version, including Conditions 3, 21 and 22.

Appendices

- Appendix B and C were replaced with revised Appendices.
- The EPA addresses in Appendix D were revised.